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To: MARE OLD CFP CONSULTATION
Subject: cfp reform consultation

To the European Commission – Directorate-General for Maritime Affairs and Fisheries

re: Reform of the Common Fisheries Policy Green paper consultation

Submission from the Rev'd Nigel Cooper

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Personal introduction

I make this submission in a personal capacity.

I am chaplain to the Cambridge campus of Anglia Ruskin University. I also chair the Ely Diocesan Environment Committee, and am a member of the national steering group of Shrinking the Footprint, the Church of England's environment initiative. I have a degree in natural science from Cambridge University (1975). I am a member of the Institute for Ecology and Environmental Management, and also a Chartered Environmentalist. I am a Fellow of the Society of Biology and a Chartered Biologist. I am a Fellow of the Linnean Society of London.

My current research topic is the valuation of ecosystem services. I do not have any specific expertise in fisheries, but since becoming concerned about the state of fisheries earlier this year, I have read up and thought about them a good deal.

General perspective

As a biologist and life-long conservationist I consider that the conservation of fish stocks is a moral duty; a duty to other humans, particularly in the poorer parts of the world and to generations yet unborn. I also consider that we have some sort of duty to the natural world itself, including fish. These are also spiritual duties. Our duty to humans includes a duty to those in the fishing industry, including a duty to maintain the possibility of fishing into the long term. As the conservation duty is greatly pressing, our duty to those in fishing includes, in large part, real support to move into new means of livelihood. There are alternative occupations and futures for the humans involved away from fishing; there is no alternative if fish populations crash so that they cannot recover.

I therefore fully endorse the statement in the Green Paper, p9, "Economic and social sustainability require productive fish stocks and healthy marine ecosystems. The economic and social viability of

fisheries can only result from restoring the productivity of fish stocks. There is, therefore, no conflict between ecological, economic and social objectives in the long term.”

In my view, one of the persistent failings of the Common Fisheries Policy since its inception has been that of the three main parties, the politicians and the fishers both begin with negotiating positions while the fish scientists offer what they consider the best science, yet the other two parties treat it also as a negotiating position rather than an un-negotiable fact of life. Thus the at the conclusion of the negotiations, fishing limits set by science are exceeded and so fish stocks continue to shrink. We humans are a part of nature and our economic and social programmes have to be adjusted to fit in with this.

If one tries to value the set of marine ecosystem services, exploitative fishing makes no economic sense. One report on this comes from the World Bank:

<http://go.worldbank.org/KDU55O9QT0>

Properly valuing coastal and marine ecosystem services is critical to sustainable development, according to the World Bank publication *Environment Matters 2008* launched April 6, 2009.

Titled: *Valuing Coastal and Marine Ecosystem Services*, the review argues that while we recognize that the ocean provides vast quantities of food, offers enormous recreational values, and stores carbon, wh[ich] is a critical service in an era of climate change. These services so vital for humankind have been treated as free goods, and the ecosystems that provide them are rapidly deteriorating through overuse, pollution, and physical destruction... Valuation of indirect ecosystem services such as the regulating role of coastal and marine resources in providing habitat for fish, as a receptor for wastewater, or to control beach erosion, is weak. Our inability to adequately capture and account for these values, has greatly jeopardized the health of marine ecosystems and their ability to continue to provide essential services in fisheries productivity, tourism amenities, coastal protection, and CO2 uptake.

"The Ocean does matter, and coastal and marine ecosystems do matter in the grand scheme of things. Their importance is vital here and now to our mission of poverty alleviation and sustainable development. We are determined to stop under-investing in coastal and marine management, and to protect vital ecosystem processes. Because, quite simply, we will have a tough time living without them," said Katherine Sierra, World Bank Vice President for Sustainable Development.

The annual contribution of ocean ecosystem goods and services to the global economy has been estimated to exceed \$20 trillion. Nonmarket values such as biodiversity and climate regulation are incalculable, and the spiritual worth of an intact seascape and the wonder of a coral reef are impossible to quantify. The last two decades have seen a rapid loss of critical wetlands and coral reefs. The UN Food and Agriculture Organization reports that 20 percent of the world's mangroves were lost between 1980 and 2005. Some 16 percent of the world's coral reefs died in the wake of widespread coral bleaching tied to the El Niño events of 1997. Under a business-as-usual scenario, scientists warn that we may witness the disappearance of coral reefs by mid-century. Climate change now threatens to push many of these systems over the edge, with severe consequences for society, but especially the world's poor. Coastal and marine ecosystems play a complex and vital role in supporting economic prosperity and social welfare in developing countries. As we progress further into the 21st century, the importance of these coastal and marine resources is certain to increase.

Page by page comments

These are given by page numbers and bullet points in the order on the page.

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Fuel-intensive fishing is not just increasingly harder to justify, it is unjustifiable given the need to reduce GHG emissions.

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30% of fish stocks are outside safe biological limits: this whole paragraph is a severe indictment of the CFP so far. The fishing effort has not been reduced, as is reported, miniscule reductions in fleet size have been offset by increased efficiency. Meanwhile, again as reported, political pressure has been to maintain the short-term at the expense of the long-term. This clearly has to change.

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Public funds, direct and indirect, must be aimed at sustainability. I support charging the industry for the public management costs and for fossil fuel prices to be taxed. This would help send a more realistic price signal to the industry.

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‘fishing rights’ – I am very uncomfortable with this terminology. Why not ‘fishing permits’ or ‘licence to fish’? The language of rights suggests some sense of property so that once given there may need to be some compensation, monetary or otherwise, for their removal.

- Yes, the basic framework must be enshrined in law. This should establish a mechanism for setting targets for the fish stock sizes etc. Then a mixture of mechanisms, including licences and financial levers, are adjusted regularly to meet the targets.
- Scrappage funds should be one-off. There should also be lay-off funds to help workers (as opposed to boat owners) adjust to life outside the industry, and funds for fishing communities to adjust.
- Transferable *permits* could be used to reduce capacity. These would need to be adjusted regularly; particularly with a short phasing downwards until sustainable stocks were achieved. These permits should be allocated to nation states who could permanently transfer them to other states to help avoid the problem of fixed national proportions of catches. Each state could then decide how to allocate their share of the permits.
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- The latter
- Fish stock sizes and age/size profiles should be defined, but also similar indicators should be incorporated for non-target species and habitats. Five-year targets should be set ahead for up to 30 years.

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Delegation of decisions is a good idea so long as the right of the European body to repeal delegations is maintained. This delegation should be repealed in particular if fish population targets are not met. This could prove a valuable incentive alongside others such as financial.

Further delegation of 'rights' to fishers should be linked to responsibilities to join area control bodies and compliance.

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Proportionality is a terrible concept in this case; it is just an excuse to renege on the priority of environmental sustainability as the basis for all other sustainabilities.

Any regional or industry group given delegated responsibilities must include representatives of other stakeholders, particularly representatives of future generations and the non-human. These non-industry members will require capacity building and support.

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- The catching sector should pay for both permits and a sizeable share of the management costs.
- Competitiveness – this concept makes little sense in the context of over-exploited fisheries. The competition is not with other fisheries but with the forces that endanger the fisheries survival, one of which is this concept of 'competition'. International fisheries are not sustainable, so the EU can take the opportunity of setting standards for imports and levying tariffs to offset foreign subsidies. Labelling is also an important way of encouraging consumers to support this move.
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- control mechanisms should be centralised
- I support a link

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- One mechanism should be applying penalties at boat level (a fine) and at the area group level (a reduced effort likely to restore the previous stock level)
- Reducing fleet capacity is tricky but essential and must not be ducked. A significant proportion of the CFP funds at the start should go into structural adjustment for the companies, the workers, and the local communities involved.
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- The CFP should move from management plans for stocks to plans for whole ecosystems.
- A two-step process might help as a greater reduction in fishing effort will be required in the short term until the fish stocks have recovered sufficiently for fishing to increase safely.
- MSY is not a sound concept as true sustainability will mean catches at less than the MSY in mixed fisheries and to protect other species and habitats.
- It is difficult to police discards and so more readily policed methods such as fishing effort, including no-catch areas (both Marine Protected Areas that are fully protected and more

limited no-catch zones that may even be seasonal, e.g. spawning grounds), alongside technology should be the main management systems. Ideally it would be good if all catches were landed. This would mean that dead fish are not wasted and it would give better statistics on the state of both the fish stocks and other species that get caught in the by-catch. In order to provide an incentive to land all catches, saleable fish should be sold. However, the annual fishing effort should be reduced to compensate. Even so, this may introduce perverse incentives and would need a complex pricing and effort system to work.

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- Relative stability should be dismantled. The current system puts perverse pressure on the TAC. Member state allocation should begin with historic proportions, but these proportions can then be traded both annually and permanently. The proportions should also allow for flexibility each year to reward member states that meet cross-compliance conditions, e.g. keeping to effort limits, effective policing, good data gathering, and to penalise those that don't.
- Yes

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The EU could promote products from sustainable sources by using independent certification systems. However, the EU should eliminate through the CFP all non-sustainable fisheries in EU waters. Even to consider otherwise, as this section presupposes, is to endanger the long-term future of fisheries.

The ecosystem approach is essential.

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Coastal communities should be supported through various EU channels.

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- High-quality research is crucial.
- There should be a research levy on the industry, perhaps levied not on fishers and their companies, but on wholesalers or retailers, and this level should be on all fish sold from all global sources. The money should be used to fund sustainable fishing globally and not just in the EU. The money should be managed by an EU body that can invest in education and training, funding research establishments and data gathering, and dissemination and communication of research results.
- My most original suggestion is that the educational profile of fishers should be raised. The CFP funding body for research should subsidise education costs for all levels in the industry. The body should also organise new qualifications for the industry at all levels, including training in research at the appropriate level. Further, both individuals and boats should then be given the opportunity to take part, even to lead, in research. This research culture should be enhanced by mutual placements of fishers and scientists in each other's work places. This should lead to a reduction of misunderstanding and suspicion, increase the scientists' appreciation of the challenges and insights of fishers, and mentor a research culture in the fishing industry.

- The top priorities for public financial support should be: reduction of capacity through a one-off scheme alongside diversification for coastal communities; research and education, including communication to the buying public; paying for landing all catches so that true data is available; policing.
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- Public funding should be conditional on member states achieving policy objectives.
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- Funds should be preferentially given to the artisanal fisheries.
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- Permanent subsidies should be eliminated, although public funds will still be needed for research and policing.

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- There is no reason why the CFP should be driven by any other objective than environmental sustainability.
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- Yes, fishers should have to pay for permits to fish in the high seas.
- If fisheries are to be fully sustainable, the creation of jobs is a long way off and should not be an immediate objective of the CFP.
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- EU funds should not support fishing in third country waters.
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- Aquaculture must be incorporated fully into CFP programmes.

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- Artisanal fisheries in developing countries need protection within a sustainable framework.
- Aquaculture is currently a damaging industry. The supply of food to the fish cultures leads to overfishing, including of new target small fish. High densities of fish leads to increased parasite load on wild fish. Both waste and pharmaceuticals from aquaculture are polluting. The CFP must include plans for aquaculture in future, to control its methods, locations and scale. Only when these have been sorted should any consideration be given to developing the scale of this industry.

Not page specific:

There is no mention of animal welfare issues. I do not know how much has already been done in this area, but probably there are big challenges in improving the welfare of fish. The CFP in this round of revision should make a start by including something on this topic, if only to agree to fund research into it.